

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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MARVIN H. MAURRAS REVOCABLE  
TRUST, YONGQIAN ZHAO, and SUSAN  
CHAGNON, Derivatively on Behalf of  
ACCRETIVE HEALTH, INC.

Plaintiff,

v.

EDGAR M. BRONFMAN JR., MICHAEL  
CLINE, STEVEN N. KAPLAN, STANLEY  
N. LOGAN, DENIS J. NAYDEN, ARTHUR  
H. SPIEGEL, III, MARY A. TOLAN, and  
MARK A. WOLFSON,

Defendants,

and

ACCRETIVE HEALTH, INC.

Nominal Defendant.

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Civil Action No. 12-cv-03395

**JOINT MOTION FOR ENTRY OF SCHEDULING ORDER**

In accordance with Fed. R. Civ. P. 16, Plaintiffs Marvin H. Maurras Revocable Trust (“Maurras Trust”) and Yongqian Zhao (“Zhao”); Interested Party Shareholder Susan Chagnon (“Chagnon”); Defendants Edgar M. Bronfman, Jr., J. Michael Cline, Steven N. Kaplan, Stanley N. Logan, Denis J. Nayden, Arthur H. Spiegel, III, Mary A. Tolan, Mark A. Wolfson; and Nominal Defendant Accretive Health, Inc. (collectively, “Defendants”), through their respective

counsel, hereby jointly move for the entry of the proposed scheduling order, submitted to the Court electronically. In support of this motion, the parties state and allege as follows:

1. On October 2, 2012, the parties appeared before the Court for a status and motion hearing. During the hearing, Plaintiff Maurras Trust and Interested Party Shareholder Chagnon informed the Court of an intention to file a consolidated amended complaint and supersede the current operative complaint filed by the Maurras Trust.

2. Upon questioning from the Court, Plaintiff Zhao indicated a willingness to enter into discussions with the Maurras Trust and Chagnon over joining in a single consolidated amended complaint, superseding the current operative complaint filed by Zhao and mooted the motion for lead plaintiff and lead counsel filed on August 8, 2012.

3. Defendants expressed no objection to the proposed consolidation.

4. The Court continued the hearing until October 10, 2012, and directed the parties to continue discussions with the aim of agreeing to a leadership structure and a briefing schedule for the filing of a consolidated amended complaint. The Court indicated that if an agreement were to be reached, the status hearing would be removed from the calendar.

5. Subsequent to the hearing, and pursuant to the direction of the Court, Plaintiffs Maurras Trust and Zhao and Interested Party Shareholder Chagnon conferred and agreed to a leadership structure and to jointly file a consolidated amended complaint, superseding all previously filed complaints.

6. Thereafter, in consultation with Defendants, the parties agreed on a briefing schedule, taking into consideration the upcoming holiday calendar and existing commitments of counsel.

7. In light of this agreement, the parties respectfully request that the *Maurras Trust* and *Zhao* matters be consolidated and that the following proposed briefing schedule be approved:

Plaintiffs Marvin H. Maurras Revocable Trust and Yongqian Zhao and Interested Party Shareholder Susan Chagnon shall have until **November 5, 2012** to file a consolidated amended complaint.

Defendants shall have until **December 18, 2012** to answer or otherwise plead.

If Defendants file a motion to dismiss, Plaintiffs' opposition to the motion to dismiss will be filed no later than **January 22, 2013**.

Defendants' reply will be filed no later than **February 8, 2013**.

Dated: October 9, 2012

Respectfully submitted,

**FREED KANNER LONDON & MILLEN, LLC**

/s/ Michael Freed

Michael Freed  
2201 Waukegan Road, Suite 130  
Bannockburn, IL 60015  
Telephone: (224) 632-4500  
Facsimile: (224) 632-4521

**SCOTT+SCOTT LLP**

Judith S. Scolnick  
The Chrysler Building  
405 Lexington Avenue, 40<sup>th</sup> Floor  
New York, NY 10174  
Telephone: (212) 223-6444  
Facsimile: (212) 223-6334

-and-

Walter W. Noss  
Joe Pettigrew  
707 Broadway, Suite 1000  
San Diego, CA 92101  
Telephone: (619) 233-4565

Facsimile: (619) 233-0508

**FARUQI & FARUQI, LLP**

Michael J. Hynes  
Ligaya T. Hernandez  
101 Greenwood Avenue, Suite 600  
Jenkintown, PA 19046  
Telephone: (215) 277-5770  
Facsimile: (215) 277-5771

*Counsel for Plaintiff Susan Chagnon*

**WEXLER WALLACE LLP**

Edward A. Wallace  
Amy E. Keller  
55 West Monroe, Suite 3300  
Chicago, Illinois 60603  
Telephone: (312) 346-2222  
Fax: (312) 346-0022

**CARNEY WILLIAMS BATES PULLIAM  
& BOWMAN PLLC**

Allen Carney  
Randall K. Pulliam  
11311 Arcade Dr., Suite 200  
Little Rock, AR 72212  
Telephone: (501) 312-8500  
Fax: (501) 312-8505

*Counsel for Plaintiff Marvin H. Maurras  
Revocable Trust*

**SUSMAN HEFFNER & HURST**

Glenn L Hara  
Matthew Thomas Heffner  
30 North LaSalle Street  
Suite 1210  
Chicago, IL 60602  
Telephone: (312) 346-3466  
Fax: (312) 346-2829

**KAHN SWICK & FOTI, LLC**

Lewis S. Kahn  
Albert M. Myers  
Melinda A. Nicholson  
206 Covington Street  
Madisonville, LA 70447  
Telephone: (504) 455-1400  
Fax: (504) 455-1498

*Counsel for Plaintiff Yongquian Zhao*

**KIRKLAND ELLIS LLP**

Leonid Feller  
Eric A Larson  
300 North LaSalle Street  
Chicago, IL 60654  
(312) 862-2000

-and-

Adam T. Humann  
Andrew B. Clubok  
Melody Wells  
601 Lexington Ave.  
New York, NY 10022  
(212) 446-6447

**PAUL WEISS RIFKIND WHARTON &  
GARRISON LLP**

Moses Silverman  
Thomas B. Sullivan  
1285 Avenue Of The Americas  
New York, NY 10019  
(212) 373-3355

*Counsel for Defendant Edgar M. Bronfman, Jr., J.  
Michael Cline, Steven N. Kaplan, Stanely N.  
Logan, Denis J. Nayden, Arthur H. Spiegel, III,  
Mary A. Tolan, Mark A. Wolfson, and Accretive  
Health, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Joint Motion for Entry of Scheduling Order was filed this 9<sup>th</sup> day of October, 2012, via this Court's CM/ECF electronic filing system, which will give notice to all parties registered to accept such notice. Any parties not so registered will be served via U.S. Mail.

/s/ Michael Freed

Michael Freed

**FREED KANNER LONDON & MILLEN, LLC**

2201 Waukegan Road, Suite 130

Bannockburn, IL 60015

Telephone: (224) 632-4500

Facsimile: (224) 632-4521